

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

JANE DOE,	)	
	)	
Plaintiff,	)	CASE NO.: 8:20CV128
	)	
v.	)	MOTION TO EXTEND RESPONSE
	)	FOR STATE DEFENDANTS
SCOTT FRAKES, Director of the	)	MOTION FOR SUMMARY
Department of Corrections, In His	)	JUDGEMENT
Individual and Official Capacity; ET.	)	
AL.	)	
Defendants.	)	

Plaintiff hereby files a Motion to extend the time to respond to the States' Motion for Summary Judgment for the reason that the Plaintiff has two Separate Motions for Summary Judgment to respond to at the same time in this case and additionally, Plaintiff's sister, who lives alone, has a serious health condition and is need of assistance to drive her to medical appointments which are scheduled three to four times a week taking the Plaintiff out of the office.

The Plaintiff respectfully requests an extension of 14 days to respond to the State Defendant's motion and fully anticipate completing the response timely to Dr. Damme and CCS's motion.

I am authorized to say that the State Defendants and the  
Damme CCS do not object to this extension.

**JANE DOE, Plaintiff,**

By Joy Shiffermiller

Joy Shiffermiller, #18164  
Abby Osborn, #24527  
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**CERTIFICATE OF SERVICE**

I hereby certify that on July 5<sup>th</sup> , 2022 I electronically filed the foregoing Plaintiff's objection to Stay with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Erik Fern  
Assistant Attorney General  
2115 State Capitol  
Lincoln, Nebraska 68509

Renee Eveland  
Cline Williams Wright  
Johnson & Oldfather, L.L.P.  
233 South 13<sup>th</sup> Street, #1900  
Lincoln, NE 68508

/s/ Joy Shiffermiller  
Joy Shiffermiller